

NOTICE OF REMOVAL

EXHIBIT A

Part 5 of 5

April 24, 2019

SUMMONS

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS DIVISION OF ST. THOMAS

ALAN HELMAN; MARJORIE HELMAN;
LEPONT PALM BEACH, LLC;
MAURICE KASPY; LIBORIO PIAZZA;
TROY HAMMOND; and TIMOTHY AKER,

Plaintiffs,

vs.

MARRIOTT INTERNATIONAL, INC., a Maryland corporation; THE RITZ-CARLTON HOTEL COMPANY, LLC, a Delaware corporation; RC HOTELS (VIRGIN ISLANDS), INC., a U.S. Virgin Islands corporation; THE RITZ-CARLTON CLUB, ST. THOMAS, INC., a U.S. Virgin Islands corporation; RC ST. THOMAS, LLC, a U.S. Virgin Islands limited liability company; MARRIOTT VACATIONS WORLDWIDE CORPORATION, a Delaware corporation; MARRIOTT OWNERSHIP RESORTS, INC., a Delaware corporation; RITZ-CARLTON MANAGEMENT COMPANY, LLC, a Delaware limited liability company; THE RITZ-CARLTON DEVELOPMENT COMPANY, INC., a Delaware corporation; COBALT TRAVEL COMPANY, LLC, INC., a Delaware limited liability company; THE LION & CROWN TRAVEL CO., LLC, a Delaware limited liability company; the NORTH AMERICAN TRUST, a land trust organized under Florida law; and DOES 1-50,

Defendants.

ST-19-CV-36

COMPLEX CASE DIVISION

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

TO: **RC HOTELS (VIRGIN ISLANDS) INC.**

Resident Agent: BoltNagi PC

Merchants Financial Center, 4608 Tutu Park Mall, Suite 202

St. Thomas, USVI 00802-1816; Phone 340.774.2944

Pursuant to 5 V.I.C. § 4911 and within the time limited by law pursuant to V.I. Civ. P. RULE 4 *Summons and Service of Process* and RULE 12(A). (a) *Time to Serve a Responsive Pleading* (see page 2) you are hereby required to appear before this Court and answer to a complaint filed against you in this action and in case of your failure to appear or answer, judgment by default will be taken against you as demanded in the complaint, for damages.

April 25, 2019

WITNESS MY HAND AND THE SEAL OF THIS COURT THIS 6th DAY OF FEBRUARY 2019.

ESTRELLA H. GEORGE
Clerk of the Court



J. RUSSELL B. PATE, ESQ.
The Pate Law Firm
P.O. Box 890, St. Thomas, USVI 00804
340.777.7283 Office
888.889.1132 Fax
Pate@SunLawVI.com
SunLawVI@gmail.com
V.I. Bar No: 1124

By: 
Deputy

NOTE: The defendant, if served personally, is required to file his answer or other defense with the Clerk of this Court, and to serve a copy thereof upon the plaintiff's attorney within twenty-one (21) days after service of this summons, excluding the date of service. The defendant, if served by publication or be personal service outside of the jurisdiction, is required to file his answer or other defense with the Clerk of this Court, and to serve a copy thereof upon the attorney for the plaintiff within thirty (30) days after the completion of the period of publication or personal service outside of the jurisdiction.

V.I. Civ. Pro. Rule 12.

DEFENSES AND OBJECTIONS: WHEN AND HOW PRESENTED; MOTION FOR JUDGMENT ON THE PLEADINGS; CONSOLIDATING MOTIONS; WAIVING DEFENSES; PRETRIAL HEARING

(a) Time to Serve a Responsive Pleading.

(1) In General. Unless another time is specified by this rule or a statute of the Virgin Islands, the time for serving a responsive pleading is as follows:

(A) A defendant served with the summons and complaint within the Virgin Islands must serve a responsive pleading within 21 days after being served.

[...]

(C) A defendant served [...] by summons and complaint by mail requiring a return receipt [...] within 30 days from the date the defendant received the process.

RETURN OF SERVICE

I hereby certify that I received this summons on the 24 day of Apr 2019,
and that thereafter, on the 25 day of Apr 2019, I did serve
the same on the above named defendant, ROSIE THOMPSON
by showing h^{er} this original and by then delivering to h^{er} a copy of the complaint and the
summons which were forwarded to me attached thereto.

MARION A. RICHARDSON
MARION A. RICHARDSON
110 CINDY BAY
ST. THOMAS VI 00004
Deputy

RETURN OF SERVICE

I hereby certify that I received this summons on the day of
20....., and that after making a careful, diligent search the defendant cannot be found in this jurisdiction.

Marshal

Deputy

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

Alan Helman; Marjorie Helman; Lepont Palm Beach LLC; Maurice Kasper; Liborio Piazza; Troy Hammond and Timothy Aker

Plaintiff(s)

Vs.

Marriott International Inc., The Ritz Carlton Hotel Company (VI) Inc
The Ritz Carlton Club, St. Thomas, Inc., RC St. Thomas, LLC, Marriot
Vacation Worldwide Corporation, Marriott Ownership Resort Inc., Ritz
Carlton Management Company, LLC The Ritz Carlton Development
Company Inc., Cobalt Travel Company LLC Inc. The Lion & Crown
Travel Co. and North American Trust and Does 1-50

Defendant(s)

No. ST-19-CV-36

ACTION FOR: Complex Case
Division Class Action Complaint
JURY TRIAL DEMANDED

TO: RC Hotels (Virgin Islands) Inc.
Resident Agent Bolt Nagi
Merchants Financial Center 4608 Tutu Park Mall
St. Thomas, VI 00802

AFFIDAVIT

TERRITORY OF THE VIRGIN ISLANDS)
DIVISION OF ST. THOMAS – ST. JOHN)

I, Marlon A. Richardson being sworn, depose and states:

1. I am a citizen of the United States, resident of the U.S. Virgin Islands, over 18 years of age, am not a party in the above entitled action, nor related to any of the parties herein; was duly appointed as a Process Server for the Superior Court of the U.S. Virgin Islands, License No. 23/2009, which Order is still valid.

2. I received copies of Summons and Complaint #ST-19-CV-36 dtd 6 Feb 19 in the above action and was able to serve as follows:

DATE RECEIVED: 24 Apr 19 DATE SERVED: 25 Apr 19 Time: 8:16am.

PERSON SERVED: Rosie Thompson (in hand).

PLACE SERVED: Merchants Financial Center 4608 Tutu Park Mall, St. Thomas, VI 00802

3. Such service was personally made by delivering to and leaving with said person true copies of said Summons and Complaint #ST-19-CV-36 dtd 6 Feb 19.

4. The person served was an adult and appeared mentally competent and was properly identified to be the person mentioned and described in said process or the person authorized according to law to receive such process.

5. I have made a diligent search and inquiry in N/A the person to be served but have been unable to find or learn of the whereabouts of the person and thus been unable to serve process on the said person.

SUBSCRIBED AND SWORN TO BEFORE ME THIS 26th

DAY OF April 20 19

NOTARY PUBLIC

Shenica Grant Santos
My Commission Expires April 25, 2022
NP-131-18

Marlon A. Richardson
11D Lindberg Bay, St. Thomas, USVI
(340) 998-8453

Marlon A. Richardson
PROCESS SERVER

Apr. 1 24, 2019

SUMMONS

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS DIVISION OF ST. THOMAS

ALAN HELMAN; MARJORIE HELMAN;
LEPONT PALM BEACH, LLC;
MAURICE KASPY; LIBORIO PIAZZA;
TROY HAMMOND; and TIMOTHY AKER,

Plaintiffs,

vs.

MARRIOTT INTERNATIONAL, INC., a Maryland corporation; THE RITZ-CARLTON HOTEL COMPANY, LLC, a Delaware corporation; RC HOTELS (VIRGIN ISLANDS), INC., a U.S. Virgin Islands corporation; THE RITZ-CARLTON CLUB, ST. THOMAS, INC., a U.S. Virgin Islands corporation; RC ST. THOMAS, LLC, a U.S. Virgin Islands limited liability company; MARRIOTT VACATIONS WORLDWIDE CORPORATION, a Delaware corporation; MARRIOTT OWNERSHIP RESORTS, INC., a Delaware corporation; RITZ-CARLTON MANAGEMENT COMPANY, LLC, a Delaware limited liability company; THE RITZ-CARLTON DEVELOPMENT COMPANY, INC., a Delaware corporation; COBALT TRAVEL COMPANY, LLC, INC., a Delaware limited liability company; THE LION & CROWN TRAVEL CO., LLC, a Delaware limited liability company; the NORTH AMERICAN TRUST, a land trust organized under Florida law; and DOES 1-50,

Defendants.

ST-19-CV-36

COMPLEX CASE DIVISION

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

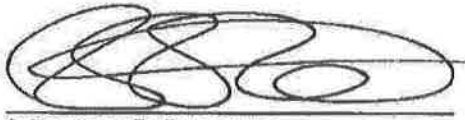
TO: THE RITZ-CARLTON CLUB, ST. THOMAS, INC
Resident Agent: The Prentice-Hall Corporation System, Inc.
St. Thomas, U.S. Virgin Islands 00802

Pursuant to 5 V.I.C. § 4911 and within the time limited by law pursuant to V.I. Civ. P. RULE 4 *Summons and Service of Process* and RULE 12(A). (a) *Time to Serve a Responsive Pleading* (see page 2) you are hereby required to appear before this Court and answer to a complaint filed against you in this action and in case of your failure to appear or answer, judgment by default will be taken against you as demanded in the complaint, for damages.

L. Quetel (Leslie Quetel)

3:15pm

WITNESS MY HAND AND THE SEAL OF THIS COURT THIS 6th DAY OF FEBRUARY 2019.



J. RUSSELL B. PATE, ESQ.
The Pate Law Firm
P.O. Box 890, St. Thomas, USVI 00804
340.777.7283 Office
888.889.1132 Fax
Pate@SunLawVI.com
SunLawVI@gmail.com
V.I. Bar No: 1124

ESTRELLA H. GEORGE
Clerk of the Court

By: 
Deputy

NOTE: The defendant, if served personally, is required to file his answer or other defense with the Clerk of this Court, and to serve a copy thereof upon the plaintiff's attorney within twenty-one (21) days after service of this summons, excluding the date of service. The defendant, if served by publication or be personal service outside of the jurisdiction, is required to file his answer or other defense with the Clerk of this Court, and to serve a copy thereof upon the attorney for the plaintiff within thirty (30) days after the completion of the period of publication or personal service outside of the jurisdiction.

V.I. Civ. Pro. Rule 12.

DEFENSES AND OBJECTIONS; WHEN AND HOW PRESENTED; MOTION FOR JUDGMENT ON THE PLEADINGS; CONSOLIDATING MOTIONS; WAIVING DEFENSES; PRETRIAL HEARING

(a) Time to Serve a Responsive Pleading.

(1) In General. Unless another time is specified by this rule or a statute of the Virgin Islands, the time for serving a responsive pleading is as follows:

(A) A defendant served with the summons and complaint within the Virgin Islands must serve a responsive pleading within 21 days after being served.

[...]

(C) A defendant served [...] by summons and complaint by mail requiring a return receipt [...] within 30 days from the date the defendant received the process.

RETURN OF SERVICE

I hereby certify that I received this summons on the 24 day of Apr 2018,
and that thereafter, on the 24 day of Apr 2018, I did serve
the same on the above named defendant, LOSCIE QUETER
by showing h^{er} this original and by then delivering to h^{er} a copy of the complaint and the
summons which were forwarded to me attached thereto.

M. A. Richardson
MARION A. RICHARDSON
Marshall
110 LINDBERG WAY
ST. THOMAS USVI 00801
.....
Deputy

RETURN OF SERVICE

I hereby certify that I received this summons on the day of
20....., and that after making a careful, diligent search the defendant cannot be found in this jurisdiction.

Marshall

.....
Deputy

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

Alan Helman; Marjorie Helman; Lepont Palm Beach LLC; Maurice Kaspary; Liborio Piazza; Troy Hammond and Timothy Aker

Plaintiff(s)

Vs.

Marriott International Inc., The Ritz Carlton Hotel Company (VI) Inc
The Ritz Carlton Club, St. Thomas, Inc., RC St. Thomas, LLC, Marriot
Vacation Worldwide Corporation, Marriott Ownership Resort Inc., Ritz
Carlton Management Company, LLC The Ritz Carlton Development
Company Inc., Cobalt Travel Company LLC Inc. The Lion & Crown
Travel Co. and North American Trust and Does 1-50

Defendant(s)

No. ST-19-CV-36

ACTION FOR: Complex Case
Division Class Action Complaint
JURY TRIAL DEMANDED

TO: The Ritz Carlton Club, St. Thomas, Inc.
Resident Agent Prentice Hall Corporation System Inc.
St. Thomas, VI 00802

AFFIDAVIT

TERRITORY OF THE VIRGIN ISLANDS)
DIVISION OF ST. THOMAS - ST. JOHN)

I, Marlon A. Richardson being sworn, depose and states:

1. I am a citizen of the United States, resident of the U.S. Virgin Islands, over 18 years of age, am not a party in the above entitled action, nor related to any of the parties herein; was duly appointed as a Process Server for the Superior Court of the U.S. Virgin Islands, License No. 23/2009, which Order is still valid.

2. I received copies of Summons and Complaint #ST-19-CV-36 dtd 6 Feb 19 in the above action and was able to serve as follows:

DATE RECEIVED: 24 Apr 19 DATE SERVED: 24 Apr 19 Time: 3:15 pm.

PERSON SERVED: Leslie Quetel (in hand).

PLACE SERVED: Water Front Plaza Veteran Drive, St. Thomas, VI 00802

3. Such service was personally made by delivering to and leaving with said person true copies of said Summons and Complaint #ST-19-CV-36 dtd 6 Feb 19.

4. The person served was an adult and appeared mentally competent and was properly identified to be the person mentioned and described in said process or the person authorized according to law to receive such process.

5. I have made a diligent search and inquiry in N/A the person to be served but have been unable to find or learn of the whereabouts of the person and thus been unable to serve process on the said person.

SUBSCRIBED AND SWORN TO BEFORE ME THIS 26th

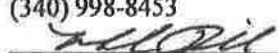
DAY OF April, 20 19.



NOTARY PUBLIC

Shenica Grant Santos
My Commission Expires April 25, 2022
NP-131-18

Marlon A. Richardson
11D Lindberg Bay, St. Thomas, USVI
(340) 998-8453


PROCESS SERVER

April 24, 2019

SUMMONS

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS DIVISION OF ST. THOMAS

ALAN HELMAN; MARJORIE HELMAN;
LEPONT PALM BEACH, LLC;
MAURICE KASPY; LIBORIO PIAZZA;
TROY HAMMOND; and TIMOTHY AKER,

Plaintiffs,

vs.

MARRIOTT INTERNATIONAL, INC., a Maryland corporation; THE RITZ-CARLTON HOTEL COMPANY, LLC, a Delaware corporation; RC HOTELS (VIRGIN ISLANDS), INC., a U.S. Virgin Islands corporation; THE RITZ-CARLTON CLUB, ST. THOMAS, INC., a U.S. Virgin Islands corporation; RC ST. THOMAS, LLC, a U.S. Virgin Islands limited liability company; MARRIOTT VACATIONS WORLDWIDE CORPORATION, a Delaware corporation; MARRIOTT OWNERSHIP RESORTS, INC., a Delaware corporation; RITZ-CARLTON MANAGEMENT COMPANY, LLC, a Delaware limited liability company; THE RITZ-CARLTON DEVELOPMENT COMPANY, INC., a Delaware corporation; COBALT TRAVEL COMPANY, LLC, INC., a Delaware limited liability company; THE LION & CROWN TRAVEL CO., LLC, a Delaware limited liability company; the NORTH AMERICAN TRUST, a land trust organized under Florida law; and DOES 1-50,

Defendants.

ST-19-CV-36

COMPLEX CASE DIVISION

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

RECEIVED
19 FEB - 6 PM 3:45
SUPERIOR COURT

19 APR 26 PM 3:27
SUPERIOR COURT

TO: **RC ST. THOMAS, LLC.**

Resident Agent: Duensing & Casner, PC

Attn: James Casner, Esq.

9800 Buccaneer Mall, Bldg. 2, Suite 9

St. Thomas, USVI 00802

Received April 24, 2019 for
RC St. Thomas, LLC
only.

Pursuant to 5 V.I.C. § 4911 and within the time limited by law pursuant to V.I. Civ. P. RULE 4 *Summons and Service of Process* and RULE 12(A). (a) *Time to Serve a Responsive Pleading* (see page 2) you are hereby required to appear before this Court and answer to a complaint filed against you in this action and in case of your failure to appear or answer, judgment by default will be taken against you as demanded in the complaint, for damages.

1:12 pm

WITNESS MY HAND AND THE SEAL OF THIS COURT THIS 6th DAY OF FEBRUARY 2019.



J. RUSSELL B. PATE, ESQ.
The Pate Law Firm
P.O. Box 890, St. Thomas, USVI 00804
340.777.7283 Office
888.889.1132 Fax
Pate@SunLawVI.com
SunLawVI@gmail.com
V.I. Bar No: 1124

ESTRELLA H. GEORGE
Clerk of the Court

By 
Deputy

NOTE: The defendant, if served personally, is required to file his answer or other defense with the Clerk of this Court, and to serve a copy thereof upon the plaintiff's attorney within twenty-one (21) days after service of this summons, excluding the date of service. The defendant, if served by publication or be personal service outside of the jurisdiction, is required to file his answer or other defense with the Clerk of this Court, and to serve a copy thereof upon the attorney for the plaintiff within thirty (30) days after the completion of the period of publication or personal service outside of the jurisdiction.

V.I. Civ. Pro. Rule 12.

DEFENSES AND OBJECTIONS: WHEN AND HOW PRESENTED; MOTION FOR JUDGMENT ON THE PLEADINGS; CONSOLIDATING MOTIONS; WAIVING DEFENSES; PRETRIAL HEARING

(a) Time to Serve a Responsive Pleading.

(1) In General. Unless another time is specified by this rule or a statute of the Virgin Islands, the time for serving a responsive pleading is as follows:

(A) A defendant served with the summons and complaint within the Virgin Islands must serve a responsive pleading within 21 days after being served.

[...]

(C) A defendant served [...] by summons and complaint by mail requiring a return receipt [...] within 30 days from the date the defendant received the process.

RETURN OF SERVICE

I hereby certify that I received this summons on the 24 day of Apr 19 19
and that thereafter, on the 24 day of Apr 19 19 I did serve
the same on the above named defendant, JAMES CASNER
by showing him this original and by then delivering to him a copy of the complaint and the
summons which were forwarded to me attached thereto.

MARION A. RICHARDSON
Marshall
110 LINDBERG BLVD
ST. THOMAS, VI 00801
Deputy

RETURN OF SERVICE

I hereby certify that I received this summons on the day of
29....., and that after making a careful, diligent search the defendant cannot be found in this jurisdiction.

Marshall

Deputy

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

Alan Helman; Marjorie Helman; Lepont Palm Beach LLC; Maurice Kasp; Liborio Piazza; Troy Hammond and Timothy Aker

Plaintiff(s)

Vs.

Marriott International Inc., The Ritz Carlton Hotel Company (VI) Inc
The Ritz Carlton Club, St. Thomas, Inc., RC St. Thomas, LLC, Marriot
Vacation Worldwide Corporation, Marriott Ownership Resort Inc., Ritz
Carlton Management Company, LLC The Ritz Carlton Development
Company Inc., Cobalt Travel Company LLC Inc. The Lion & Crown
Travel Co. and North American Trust and Does 1-50

Defendant(s)

No. ST-19-CV-36

ACTION FOR: Complex Case
Division Class Action Complaint
JURY TRIAL DEMANDED

TO: RC St. Thomas LLC
Resident Agent Duensing & Casner PC
Attn: James Casner
9800 Buccaneer Mall Bldg. 2 Suite 9
St. Thomas, VI 00802

AFFIDAVIT

TERRITORY OF THE VIRGIN ISLANDS)
DIVISION OF ST. THOMAS – ST. JOHN)

I, Marlon A. Richardson being sworn, depose and states:

1. I am a citizen of the United States, resident of the U.S. Virgin Islands, over 18 years of age, am not a party in the above entitled action, nor related to any of the parties herein; was duly appointed as a Process Server for the Superior Court of the U.S. Virgin Islands, License No. 23/2009, which Order is still valid.

2. I received copies of Summons and Complaint #ST-19-CV-36 dtd 6 Feb 19 in the above action and was able to serve as follows:

DATE RECEIVED: 24 Apr 19 DATE SERVED: 24 Apr 19 Time: 1:12 pm.

PERSON SERVED: James Casner (in hand).

PLACE SERVED: 9800 Buccaneer Mall Bldg. 2 Suite 9, St. Thomas, VI 00802

3. Such service was personally made by delivering to and leaving with said person true copies of said Summons and Complaint #ST-19-CV-36 dtd 6 Feb 19.

4. The person served was an adult and appeared mentally competent and was properly identified to be the person mentioned and described in said process or the person authorized according to law to receive such process.

5. I have made a diligent search and inquiry in N/A the person to be served but have been unable to find or learn of the whereabouts of the person and thus been unable to serve process on the said person.

SUBSCRIBED AND SWORN TO BEFORE ME THIS 26th

DAY OF April, 20 19.

NOTARY PUBLIC

Shenica Grant Santos
My Commission Expires April 25, 2022
NP-131-18

Marlon A. Richardson
11D Lindberg Bay, St. Thomas, USVI
(340) 998-8453

Marlon A. Richardson
PROCESS SERVER